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Attorneys for Defendant
THOMAS P. SCHMALZRIED, M.D.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

11 || GERALDINE BARSOTTI

Plaintiff,

V.

14 JOHNSON & JOHNSON SERVICES,
15 INC.; JOHNSON & JOHNSON, INC.;
16 DEPUY ORTHOPAEDICS, INC.;
17 THOMAS P. SCHMALZRIED, M.D.;
18 PINNACLE WEST ORTHOPAEDICS,
INC.; GOLDEN STATE
ORTHOPAEDICS, INC.; AND DOES
ONE through ONE HUNDRED,
Defendants,

Case No. 3:15-cv-03603-EMC

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT RE
DEFENDANT THOMAS P. SCHMALZRIED,
M.D.**

Complaint served: July 20, 2015
Removed: August 06, 2015
Current Response Date: August 13, 2015
Agreed Response Date: September 14, 2015

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant Thomas P. Schmalzried, M.D. (“Defendant”) hereby request and Plaintiff Geraldine Barsotti (“Plaintiff”) hereby agree to Defendant’s request, for an extension of time for Defendant to file a response to Plaintiff’s Complaint as follows:

WHEREAS, Plaintiff's Complaint was filed in state court on June 23, 2015 and
Defendant was served on or about July 20, 2015;

26 WHEREAS, this matter was removed to this court on August 06, 2015;

WHEREAS, Defendant request an extension up to and including September 14, 2015, to file a responsive pleading to Plaintiff's Complaint. Plaintiff has agreed to Defendant's request.

THEREFORE, the parties agree that Defendant Thomas P. Schmalzried, M.D. will have until September 14, 2015 to file its response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED: August 11, 2015

SEDGWICK LLP

By: /s/ Christopher P. Norton

Ralph A. Campillo, Esq.

Wendy A. Tucker, Esq.

Christopher Norton, Esq.

Attorneys for Defendant
THOMAS P. SCHMALZRIED, M.D.

DATED: August 11, 2015

WALKUP, MELODIA, KELLY & SCHOENBERGER

By: /s/ Matthew D. Davis

Matthew D. Davis

Khaldoun A. Baghdadi, Esq.

Attorneys for Plaintiff

GERALDINE BARSOTTI

*Pursuant to Local Rule 5-1(i)(3), Christopher Norton hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.  DISTRICT

IT IS SO ORDERED:

EDWARD M.

U.S. DISTI

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ORDERED:

IT IS SO ORDERED

IT IS S

— 1 —

Judge Edward M. Chen

CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick LLP, 801 South Figueroa Street, 19th Floor, Los Angeles, California 90017-5556. On August 18, 2015, I served the within document(s):

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT (L.R. 8-3) RE DEFENDANTS THOMAS P. SCHMALZRIED, M.D.

- MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California.
- ELECTRONIC MAIL – by serving via CM/ECF to the United States District Court, Northern District of California, addressing all parties appearing on the Courts ECF service list.

Matthew D. Davis
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**Attorneys for Plaintiff GERALDINE
BARSOTTI**

**Attorneys for Defendant
DEPUY ORTHOPAEDICS, INC.**

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed at Los Angeles, California on August 18, 2015.

/s/ Kim Wlodarczak
Kim Wlodarczak